

INTERVENTION
ORIGINAL



0000149906

BEFORE THE ARIZONA CORPORATION

COMMISSIONERS

BOB STUMP, Chairman
GARY PIERCE
BRENDA BURNS
BOB BURNS
SUSAN BITTER SMITH

RECEIVED

2013 DEC 20 A 9:38

CORP COMMISSION
DOCKET CONTROL

Arizona Corporation Commission
DOCKETED

DEC 20 2013

DOCKETED BY

NR

THE MATTER OF THE COMMISSION'S)
INQUIRY INTO POTENTIAL IMPACTS TO) DOCKET NO. E-00000J-13-0375
THE CURRENT UTILITY MODEL RESULTING)
FROM INNOVATION AND TECHNOLOGICAL) **DIRECT ENERGY SERVICES, LLC**
DEVELOPMENTS IN GENERATION AND) **APPLICATION FOR LEAVE TO**
DELIVERY OF ENERGY.) **INTERVENE**

Pursuant to A.A.C. R14-3-105, Direct Energy Services, LLC ("Direct Energy") hereby makes Application for Leave to Intervene ("Application") in the above-captioned and above-docketed proceeding ("Instant Proceeding"). In support of this Application, Direct Energy submits the following information:

1) Direct Energy was an active participant in the Commission's recently concluded generic docket inquiring into the subject of retail electric competition (Docket No. E-00000J-13-0375).

2) The Instant Proceeding is an outgrowth of the Commission's September 11, 2013 decision to administratively close the aforesaid generic docket on retail electric competition. In that regard, the Instant Proceeding was instituted by means of a November 4, 2013 letter from Commissioner Robert L. Burns to his fellow Commissioners, and a related November 4, 2013 Memorandum from Commissioner Robert L. Burns to the Commission's Docket Control requesting that a new generic docket be opened and a docket number assigned to address the subject discussed in the aforesaid November 4, 2013 letter from Commissioner Robert L. Burns.

3) Direct Energy's business model includes the provision of some of the types of services and equipment described in Commissioner Robert L. Burns' December 5, 2013 letter to his fellow Commissioners and Interested Stakeholders, which was docketed in the Instant Proceeding on December 5, 2013. In that letter, Commissioner Robert L. Burns set forth a proposed scope for the Instant Proceeding and a proposed approach for accomplishing the goal

1 of the Instant Proceeding.

2 4) Direct Energy could be directly and substantially affected by a Commission
3 decision or decisions hereafter issued in the Instant Proceeding.

4 5) No other party or interested stakeholder can adequately represent the particular
5 interests of Direct Energy within the context of the Instant Proceeding.

6 6) Direct Energy's participation in the Instant Proceeding will not unduly broaden
7 the issues to be addressed therein.

8 7) Service of all correspondence, documents or pleadings in connection with Direct
9 Energy's intervention in the Instant Proceeding should be made upon the following
10 representatives of Direct Energy:

11 Lawrence V. Robertson, Jr.
12 P. O. Box 1448
13 2247 E. Frontage Road, Suite 1
14 Tubac, Arizona 85646
15 Email: Tubaclawyer@aol.com

14 and

15 Andrea Deveau, Senior Director
16 Policy Innovation and Market Development
17 Direct Energy Services, LLC
18 andrea.deveau@directenergy.com

18 WHEREFORE, for all of the foregoing reasons, Direct Energy hereby requests that this
19 Application be granted.

20
21 Dated this 18th day of December 2013.

22
23 Respectfully submitted,

24 

25 Lawrence V. Robertson, Jr.
26 Attorney for Direct Energy Services, LLC

27 The original and thirteen (13) copies
28 of the foregoing will be mailed for filing
this 18th day of December 2013 with:

1 Docket Control Division
2 Arizona Corporation Commission
3 1200 West Washington Street
4 Phoenix, Arizona 85007
5
6 A copy of the same served by e-mail
7 or first class mail that same date to:
8
9 Greg Bass*
10 Noble Americas Energy Solutions
11 401 W. A Street, Ste. 500
12 San Diego, California 92101-3017
13
14 Michael W. Patten
15 Jason Gellman
16 Roshka DeWulf & Patten, PLC
17 One Arizona Center
18 400 E. Van Buren St. - 800
19 Phoenix, Arizona 85004
20
21 Bradley S. Carroll
22 Kimberly A. Ruht
23 Tucson Electric Power Company
24 88 E. Broadway Blvd. MS HQE910
25 P.O. Box 711
26 Tucson, Arizona 85702
27
28 Dillon Holmes*
Clean Power Arizona
9635 N 7th St. #47520
Phoenix, Arizona 85068
John Wallace*
GCSECA
2210 South Priest Drive
Tempe, Arizona 85282
Christopher Hitchcock
Law Offices of Christopher Hitchcock
SSVEC
P. O. Box AT
Bisbee, Arizona 85603-0115
Jack Blair
SSVEC
311 E. Wilcox Drive
Sierra Vista, Arizona 85635-2527

Michael A. Curtis*
William P. Sullivan
501 East Thomas Road
Phoenix, Arizona 85012-3205

Sidney Smith, Manager*
HoHoKam Irrigation & Drainage District
142 South Arizona Boulevard
Coolidge, Arizona 85128

Heather McInelly*
Renewable Resources Specialist
Navopache Electric Cooperative
1878 W. White Mountain Blvd
Lakeside, Arizona 85929

Stephanie Wojcik, Finance Director*
Town of Wickenburg
155 N Tegner, Suite A
Wickenburg, Arizona 85390

Peggy Gillman, Manager*
Public Affairs & Energy Services
Mohave Electric Cooperative, Inc.
P.O. Box 1045
Bullhead City, Arizona 86430

James Hamilton *
Hamilton Consulting
822 N. 5th Ave
Phoenix, Arizona 85003

Anthony Wanger *
Alan Kierman
IO Data Centers
615 N. 48th Street
Phoenix, Arizona 85008

LAWRENCE V. ROBERTSON, JR.
ATTORNEY AT LAW
P. O. Box 1448
Tubac, Arizona 85646

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Christopher D. Thomas*
Fred E. Breedlove III
Squire Sanders (US) LLP
1 East Washington, 27th Flr.
Phoenix, Arizona 85004

Lyn Farmer
Chief Administrative Law Judge
Hearing Division
Arizona Corporation Commission
1200 W. Washington
Phoenix, Arizona 85007-2927

Janice Alward, Chief Counsel
Legal Division
Arizona Corporation Commission
1200 W. Washington
Phoenix, Arizona 85007

Steve Olea, Director
Utilities Division
Arizona Corporation Commission
1200 W. Washington St.
Phoenix, Arizona 85007

* Service list request only

